

CHARLES R. JONES
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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

CHARLES R. JONES
Plaintiff,

LVMPD
Clark County DA
Cosmopolitan Hotel
Cox Cable
Defendant(s),

2:15-cv-00666-RFB-CWH

JURISDICTION

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

COMPLAINT

The Las Vegas Metropolitan Police Department, the Clark County District Attorney, Cox Cable and The Cosmopolitan Las Vegas Hotel together all conspired to harass, attempt to transfer and terminate Investigator Charles Jones (known as Chuck Jones) from his job which he held since 7-8-2010. In 2010 Corporate Investigator Tim Shalhoob from the MEM came by saw Jones working at the Cosmopolitan Hotel. Tim use to be a Sergeant with Metro as Jones was. Thereafter Shalhoob acted as a go between with LVMPD. After Captain Todd Fasulo met with Operations Manager Nick Jacobitz and VP

Cindy O'Keefe. Shortly thereafter a new Director Billy Huddy was hired and harassment toward Jones started. Efforts were made to consistently record videotape and monitor every action taken by Jones. His work was consistently criticized by Huddy and Jacobowitz. An effort was made to move Jones, Pidcock, and Boynton out of Investigations. This resulted in Jones filing a Hostile Work Environment against the Director. VP. Daniel Espino decided to halt the move while a new strategy was put together. Eventually Pidcock was asked to spy

on Jones. He began using Assistant Investigators to spy and report on Jones.

Thereafter Jones was repeatedly harassed by Huddy trying to make him quit. This was witnessed several times by Jacobitz and Pidcock. Huddy did not give Jones and evaluations the last 2 years even though he did give Pidcock evaluations.

Twice while power went out on my computer and phones Cox Cable sent law enforcement officers into my home acting as Cox employees. I recognized one of these subjects as a male I had seen following me two weeks earlier at Cafe Rio in Blue Diamond where I was having lunch with my family. When this subject left my house he went outside and the other male who had been with him a Cafe Rio came by in another truck slowly and said Hey, buddy, I called Cox Cable about this and he was informed about this but refused to tell me anything.

Around October 2010 a Former Investigator for the Clark County DA observed me in Court. He

asked what I was doing and I told him I was an Investigator at the Cosmopolitan Hotel. He asked who the Director of Security was and I told him Anthony DiSalvatore and Mike Karstedt said he didn't know him. He asked who else was there and I mentioned Jose Trancoso the former Chief of Police from North Las Vegas. Karstedt said he knew Jose and had his phone number.

A short time later Anthony DiSalvatore and Manager Dan Caroway harassed Jones both at a night event and at work calling him a pedophile of boys. I complained about this to Beverly Shields the head of the People Dept. This behavior by the Hotel continued until 10-16-14 when Jones was separated. He was not told why and an outside attorney did an investigation and

Jones was terminated with Francis Rupp. Jones filed a request for an unemployment hearing to show he was being harassed and separated unlawfully. The Hotel did not contest the unemployment and it was granted to both Jones and Rupp.

It is a week after my termination that a request was made to the Hotel to provide information that was used to separate Jones. The NRS was cited but was returned except a Personnel file with none of this information in it, that had been requested.

This conspiracy against Jones has ruined this reputation, has prevented him from getting another job and law enforcement has been in my home computer for

8 years. No one has ever asked to speak to me about anything. Cox also allowed law enforcement into his home and work computer. During this time Jones took time off with his wife and took a cruise to Mexico. When Jones returned he was playing poker on the Poker Stars website for play money. One day one of the players sent a message to Jones asking how many little girls he molested in Mexico. No one work know my Poker name unless the entered my computer.

This has been going on and they have searched my entire computer and found nothing. This has ruined my life and my employment.

DEMAND

The Plaintiff is requesting that Cox Cable remove the device from my box in front of my house and stay out of my computer. Because they did this and allowed officers into my house posing as Cox employees, that Cox pay Plaintiff 2 million and provide free cable for Plaintiff.

The Cosmopolitan Hotel will provide copies of the paperwork used to terminate Jones and provide all information that was requested from the original letter sent after his employment. Additionally Cosmopolitan will provide all of Billy Huddy's, Nick Jacobitz and Cindy O'Keefe emails with Captain Fasulo and other

emails between June 1, 2012 to Jones termination. Additionally the Cosmopolitan will pay Plaintiff \$2,000,000.00 plus \$70,000 for wages Jones would have earned until he quit his job in April 2016. The 2,000,000.00 is for the harassment and pain and suffering endured by Jones while doing his job.

Plaintiff request the LVMPD Police Dept. tell Jones why they have treated him this way and ruined this job he had as an Investigator. Department will change procedures in the future to prevent go after people without asking them anything. Additionally

they will put together an apology letter along with Clark County DA's Office which will be okayed by Jones and published in the RJ on 2 full page and run for 7 days. Additionally DA will identify any search warrants issued for Jones or his residence. In conjunction with LVMPD they will identify participating agencies who will add their names to the apology letter. If they refuse to do this they will be sued monetarily.

Clark RJ

The Las Vegas Police Department, along with the Clark County District Attorney's Office, Cox Cable, Clark County DA's Office and the Cosmopolitan Hotel employees all conspired to harass retired Sergeant Chuck Jones who was employed at the Hotel as an Investigator. A former Clark County DA investigator Mike Karsted called former Las Vegas Chief of Police Jose Trancoso who was one of the Managers at the Hotel. Trancoso told Director Anthony Di Salvatore who put Manager Dan Caraway up to harass Jones. He called Jones a child abuser at a bowling night and then again the next day in the office in front of Security Managers Allen Duke and Nicholas Jacobitz. He accused Jones of molesting little boys. Jones should have went to the People Dept but was trying to work and did not want to cause issues for his new job, but he knew something had been said to Management. Jones had turned his brother in to law enforcement when he went on the lamb and took off in a 1997. It was over two years and he hadn't been heard from and Jones didn't know where his brother was. The FBI had contacted Jones at home and asked to send them the false ID he had belonging to his brother, but Jones never sent it because he had misplaced it at the time and was more concerned with where he was. Nothing else was said to Jones after that but Director Salvatore said he had lunch with LVMPD Captain Charles Hanks who spoke highly of Jones but who refused to say anything about Jones that Di Salvatore was inquiring about. Two weeks later Di Salvatore said Hanks took him to lunch and told him what he believed Jones had done and Di Salvatore came back told Jones he had lunch with Hanks. Instead Di Salvatore moved out of his office and placed Investigators in there under audio recordings in order to record everything Jones said. This was a private office which housed all three Investigators. In April of 2011 Di Salvatore was fired from the Hotel because then Assistant Manager Nick Jacobitz made friends with higher management personnel and complained about Di Salvatore. Two months later a new Director Billy Huddy was hired and given a task by Hotel VP Cindy O'keefe to get rid of Jones. She tried to get Jones and to fire Randy Boynton and Wallace Pidcock at the same time.

The new Director Billy Huddy and Operations Manager Nicholas Jacobitz met with then Captain Todd Fasulo and planned a strategy to allow Jones to be recorded, videotaped and harassed repeatedly while employed at the Cosmopolitan. An attempt was made to transfer the three Investigators to Surveillance and both Randy Boynton and Wally Pidcock were both targeted with Jones in order not to make it appear suspicious or targeted at Jones. Jones filed a Hostile Work Environment claim against the Security Dept and VP Daniel Espino cancelled the move. Right after this I got a call from former Metro Sergeant Tim Shalhoob (now a Corporate Investigator with MGM) who was relaying information to Metro investigators because he wanted to know if I was going to quit. I told him I didn't do anything, why should I quit. When Operations Manager Nick Jacobitz saw Jones was complaining he offered Jones a new job but when Jones asked about Boynton and Pidcock he was told they were being transferred. Jones informed him he would not do that to his co-workers. In 2012 employees from the Investigations Section were placed under audio and video. Operations Manager Nick Jacobitz called Jones into his office and told him they were moving Investigations into the Dispatch Office. At the time Mr. Huddy stated we would not be under video surveillance but it was learned later that we were being fully videotaped, because a Surveillance Investigator was called and said he couldn't see me, I stuck head out around the corner which was out of the area Mr. Huddy told us wasn't going to be videotaped. A complaint against Mr. Huddy was filed by Jones to the People Dept. (Personnel) that he had lied to Investigators Jones and Pidcock about this issue in prior meeting. The complaint was to stop the constant harassment by Director Huddy toward Jones. Thereafter Jones was retaliated against by the People Dept. who were looking for something to fire back at Jones for his complaint against Director Huddy. Jones was written up at the direction of Director of People Christy Wheeler. Wheeler told Jones that Director in Surveillance told Director Huddy he was not going to change the camera in an email. Wheeler said Huddy showed her the email and Jones asked to see it but she wouldn't show it.

Jones knows his situation was discussed in staff meetings with upper Management. One day I found out my brother had died and was upset about it and cried. Director Huddy came in my office in the Security Dept which meant could hear us or was called and told about it. The following day I was past another Director in the Hotel Section and he said I'm sorry about your brother. They had just came out of a Management Meeting. It was upper Management (Tom McCartney) who directed Director Huddy to start the Best of the Best File in April of 2013, and then use that to terminate Jones and Assistant Investigator Frank Rupp.

On October 16, 2014 Director Huddy saw me in the Co Dining area and approached me. He said when you are done can you meet me in Director Wheeler's Office. I knew then I'd be terminated. When I sat down in Christy Wheeler's office she said you know we have finished the investigation on the BOB file. She said the Hotel has decided to part ways with you. I said you must be kidding, I did nothing wrong. I pointed at Director Huddy and said he was the one who ordered us to save it and I'm getting fired. Since they had been trying since Huddy started there this wasn't a surprise. I asked what I did wrong and she said you violated Company policy and I asked which one. No one answered. I asked again and no one could tell me what I did. Then she said you watched video. I said that is my job. She then said Legal Anthony Pearl signed off on it. (That told me there was more to this than the BOB file). Then Director Huddy said you violated Department policy and Company policy. I again asked which one. No one would identify which policy. I complained but I was escorted off and trespassed in the garage because I could tell Managers Allen Duke and Brandon Jones were told to trespass me by Director Huddy. It was disguised to prevent the Hotel from the information they had received from Law Enforcement which provided information to terminate Jones. Rupp was fired at the same time as a cover.

A letter was written to the People Dept citing NRS 608.075 and NRS 613.075 asking for any records used to determine the qualifications of my employment and any disciplinary actions taken against me, including my termination and provide me a copy after my inspection. Within 10 days I received a packet back with nothing in it except my file which had no information on separation or why? After both Jones and Rupp filed an unemployment action and requested a Hearing. I wanted to have a hearing by the Hotel did not want reveal they had received informatin from Law Enforcement so they granted the unemployment without a hearing. The Hotel decided not to object and granted Jones and Rupp unemployment.

I emailed this to VP Espino after being terminated. VP Espino tried to get Jones to sign a release of liability form in exchange the unemployment benefits which Jones agreed to in email but said he could not because they needed to remove the one section which stated the Hotel could prove he did wrong. Jones informed Espino he did nothing wrong. Jones refused to sign the release because he did nothing wrong. A week later the unemployment was granted. The Hotel could not give the real reason for Jones being separated because they have been conspiring with law enforcement to fire Jones. They interferred shortly after I was employed and continually tried to fire me without cause looking for some reason to terminate me. Without their help nothing could be proved.

In 2013 the internet in my home went down. It went down because my mother-in-law had visited us over the weekend and she had unplugged a cord in my son's room which lead to the router. This caused us to not have service. I contacted Cox Cable and asked them to dispatch a service representative. About 2 hrs. later I received a call from a male who identified himself as a Cox repairman. I explained to him I no longer needed him since I had discovered the problem and he said he would still come over which made no sense to me. When he arrived at my door I recognized him as one of the males who had been having a drink at the Cafe Rio on Blue Diamond about 10 days earlier. He was sitting there with another larger male and a female. I noticed them because they had no food and all just had a drink. One of males looked exactly like a son of a former officer that worked for me in Laughlin years earlier. I wondered at the time if it could be his son? This was the same person. I invited him in but followed him upstairs to the room. He used his screw gun to unscrew the outlet and did nothing but put it back. I asked him some questions to see who how he answered. He said he had moved here about a year earlier from San Diego. After he went downstairs and said he was going to to outside and work on the box on the street. I figured at this time he was going to remove the connection which allows law enforcement to access by home computer, or upgrade it to a better model. As I went outside to check the mail and take a photo of his truck I was standing over him and he asked, "do you want to see what I'm doing." I said, "no, just the mail and stepped around him." As I was there and getting to close to him a truck parked at the end of the street came driving by my house very slow. The drive had his window down and said something to me as I looked at him. It was the other male who had been with the other two at Cafe Rio. He said how's it going Bud. Typical comments by cops. I didn't recognize anyone from Metro, but then people change. They could be from Henderson PD or with the Federal organizations. I took a picture of the truck used by the guy who entered by house.

After Fasulo did the job that Captain Hanks refused to do, he was promoted to a Deputy Chief for his

activity with Huddy and Jacobitz and arranging for the recordings and meetings with them to harass me until I quit my job. Several Sexual Assault Detectives visited Jones several times but always with the pretense of asking about a case at the Hotel. I waited for one of them to say something to me or ask a question but none ever did.

The police department and other agencies have harassed Jones repeatedly and never once asked to speak with Jones about anything. I have personally called the Sergeant in Sexual Assault and asked him if he to talk to me about anything. He said NO! I told him if anyone did to contact me. I also went to IAB to complain about what had been done to me on my home computer and at my employment. When I called the Detective back he said it was determined to be unfounded and no complaint. No letter was sent to me as Metro is suppose to do saying the case was closed. I knew Director Huddy was constantly trying to get me to quit, so I came up with an idea to use their own activity to try to catch them and it worked. I sent a photo to a female who had complained of a Sexual Assault at our hotel. I knew from past police work this case would not go anywhere. I had her contact Metro with and let them know we had video that might them identify the culprit. The detective was given all the information. I knew he would know find out about the photo I sent and he would bring it to their attention since they wanted me fired. It took along time to come back at me with the information and it was a made up email supposedly sent from his employer but you could tell it was pasted. Risk Manager Brian Record asked me over the phone if I had sent that picture and I told him no at the time because I needed to see the reaction from Metro to prove it. The following day I got what I wanted. A LinkedIn email was sent to me with a former cop I knew. When I opened it the second phone attached was the original photo I had sent. This was what I needed to prove they were doing this to me along. I printed it out. I hated to lie to Brian but it was a setup by myself to prove it. This happened around May and shortly thereafter Billy Huddy started the Best of the Best File which was designed for one thing to set me up to fire me. Something he had been trying since he started working there.

On 10-2-12 in the early morning Billy came into Investigations with Russ Mousaw and asked if Xavier had passed on information from a request he had given Xavier about a missing camera from the Blvd pool green room. I told him I would check on it. He asked if Xavier had sent a pass on note to Day shift. I immediately checked Itrak for an incident report and found nothing. I asked Russ and he said on Monday when they were eating lunch Billy sat down and told Xavier something about checking video. Russ didn't know what it was and Xavier never told him. I checked everything and all cases and saw nothing. I know Xavier is competent enough to pass on information. Later that day I noticed Russ was very quiet and didn't say much the rest of the day. I was beginning to believe the request by Billy was not real. He has always forwarded any email he wanted checked to me. On 10-3-12 Billy again came in the office while I was out collecting a camera from Room 4727. When I returned the door to our office was closed. Billy opened it and I saw Nick sitting talking to Kevin. Billy looked at me and said I'm done here and walked off. Nick Jacobitz said the communications in our office sucked and had to improve. I told him that the information Billy asked for doesn't exist. Billy sent to email and there is no report. What are we looking for. Billy is making something out of nothing. and said he doesn't know anything about these and started dividing duties between Wally and me. During the conversation I told Nick he had nothing to fear from me and he said I know I don't.

On 1-3-12 at around 1000 hrs. I called Xavier and asked him if Billy ever talked to him about saving video from the Blvd pool Green Room. Xavier said Billy never approached him or asked him about it. He said Billy might have asked Russ but not him. He would have jumped on it right away. Statements will be obtained.

So that was it. It was all a scam to watch me get upset and try to get angry. Nice one! That is why Russ was quiet all day, he like doing this but Billy told him to.

Additionally they have followed me, recorded me, on my phone, scabbled up all my numbers with different faces on my phone. When the phone was turned off they have recorded me and I knew they were so I set them up so I could prove it.

They have threatened both my son and my brother, I'm sure my sisters and relatives and friends. My

brother was turned in by me when I was a Police Sergeant and I believe they told him I did this when I was a Police Sergeant so he is motivated to record me.

I have had to Lie, Cheat and Steal in order to prove they were doing this at my job. I found proof on my home computer, on my work computer and through my ability to tell when others are trying to set me up. **On a Poker Star site one day I was playing and another person when he wrote on my computer, "How many girls did you molest when you were on vacation in Mexico?" No one would know that except Law Enforcement that my wife and I just returned two weeks earlier.**

Corporate Investigator Tim Shalhoob at the MGM also came by and when it was originally attempted to transfer me Tim asked me if I was going to quit. I told him I did nothing to have to quit. Tim again visited me at the Cosmopolitan Hotel and acting as agent for the Police Dept he said they have a problem with the lies. I told him I don't lie unless I'm forced to. I knew the they meant Law Enforcement. So Tim was acting as their Agent.

I have done nothing to deserve this. Do I know something that might clear it up? Yes, I do but I waited for years for them to ask and they never did. I reported this incident to the Police Department chain of command in 1999. No one ever contacted me. I retired in 2008. Since then no one person who has come to see me in the Cosmopolitan has asked me one question.

Items of evidence include an email from my computer showing I ordered a lock pick from Northern Tools. While playing on Poker Stars on my home computer another player won a play money pot and said I picked a lock with that one. I said not yet and he replied touche. I also have an email from LinkedIn where the law enforcement sent me a contact request and attached to the bottom of it was the photo of the person the hotel was accusing me of sending. Perfect I needed that to prove they were harassing me. I also had lunch with a former Academy classmate and during that I told him I wished I had worked 5 more years and he said I wish you had too. He didn't like what was happening at the Hotel and them having to go through this.

WHAT STEPS HAVE YOU TAKEN TO COMPLAIN/APEAL/RESOLVE THIS ISSUE. INCLUDING FILING COMPLAINTS WITH OTHER ORGANIZATIONS?

When the Cosmopolitan tried to transfer me because of a Hostile Work Environment I had filed with the Federal Court office of Equal Rights. Since they never transferred me the case was closed. I also called the Metro Sexual Assault and asked them if they wanted to talk to me and they said NO. I also went to IAB at Metro and filed a complaint and they didn't even acknowledge it and when I called they said it was closed. Never sent me a letter. I also approached 5 different attorneys who have refused to work on this due to the complexity of the investigation.

PLEASE STATE CLEARLY WHAT YOU WOULD THE ACLU OF NEVADA TO DO FOR YOU.

I want them to file a claim on behalf of all citizens and myself about the illegality of their actions by Metro, FBI, Cox Cable, Clark County DA's Office and the Cosmopolitan Hotel. I can also file against Station Casinos and MGM but I'd rather hold off on them since I know the two involved who work there. It's not their fault.

Current Employment:

Anthony Di Salvatore currently works at a casino in New Jersey.

Charles Hank is a Captain with Metro.

Cindy O'Keefe works at the Golden Nugget at Senior VP.

Nick Jacobitz is the current Director of Security at the Golden Nugget.

William Huddy is the current Director of Security at the Cosmopolitan Hotel

Allen Duke is a Manager at the Cosmopolitan Hotel

James Hill is a Manager at the Cosmopolitan Hotel

Mike Karstedt is a Retired Metro Detective and former Investigator at the Clark County District Attorney's Office

Jose Troncoso is the former Chief of Police of North Las Vegas. He was a manager before being fired by Anthony Di Salvatore.

Greg McCurdy currently works as a VP at the SLS Casino. He is a former Asst Sheriff and my former academy memeber.

Retired LVMPD Police Sgt. Tim Shalhoob currently works as Investigator at MGM Corporate.

Dan Caraway currently lives in Texas, he was a former Manager at the Cosmopolitan Security. Phone (817) 375-5441

Investigator Wallace Pidcock is a current Investigator at the Cosmopolitan Hotel. He was tasked with plotting against me while I worked at the Hotel.

Randy Boynton. Former Investigator who left for a Director job in New Mexico. Possible Phone numbers (775) 410-2873, CELL (760) 937-1987, (505) 728-0856

Russ Mousaw - Former Investigator who left the job about two week after we were terminated. He is also the one Billy forced to do something towards me and Investigator Pidcock forced to report to him. He can be reached at (702) 274-1915.

Frank Rupp - Former Investigator let go at the same time as me. Also told by Pidcock to report to him information on me so he could report to Director Huddy. (702) 279-2497.

Nick Jones - My son. He did not report to me he was contacted and that means they have threatened him. He has recorded me and reported back to whoever he is being told to report to. (702) 813-9210.

Rick Jones - my younger brother. He is currently on Parole and was missing for 2-3 years when I asked the Fugitive Squad to take a look and see they could locate him. I believe they have forced him to engage me and record me. I have seen him reach for his phone. He is afraid to say anything as is my son. (702) 485-8806.

My neighbors on all sides of me were very friendly then all of a sudden they have started acting different with me when I saw undercover officers talking to them.